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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RM-8143

Amendment of the Commission's Rules to Define Effective Means for Interworking of Customer Premises Equipment and Public Enhanced 9-1-1 Systems

NORTH AMERICAN TELECOMMUNICATIONS ASSOCIATION

In its comments on the petition, NATA stated that the problem raised by Adcomm is inappropriately viewed as a "CPE" problem. The problem is not due to any defect in CPE design, and should not be addressed by mandating mass retrofitting of CPE. NATA also expressed serious concerns about (1) the type of telephone company service to which the petition contemplates that PBX users should subscribe in order to facilitate E911 service, (2) the costs associated with such service, and (3) the manner in which such costs should be recovered. NATA urged the Commission to ensure that, if solutions are adopted at a national, industrywide level,

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they utilize the most cost-effective approach, and are structured so as to avoid placing unreasonable burdens on PBX users and their suppliers.

BellSouth and GTE appear to share many of NATA's concerns, and raise a number of important and legitimate points. GTE states that "[a]ny rule developed by the Commission in this area must be fashioned in a way that balances the needs and burdens of the parties involved: PBX owners, County governments, and LECs." GTE Service Corporation at 3. NATA agrees, except that we would add PBX and other customer premises equipment ("CPE") manufacturers and suppliers to the list of parties whose needs and burdens must be considered.

Both BellSouth and GTE express concerns similar to NATA's about the high cost of the solution proposed by Adcomm. As GTE points out:

Requiring all PBXs and KTSS be made compatible with E911 caller and location identifying capabilities may burden private system owners with high costs to modify or replace their existing equipment.

GTE at 3.

In addition to equipment modification costs, there are the costs of the dedicated trunks to which the petition contemplates each CPE user would have to subscribe. As Bellsouth points out:

Since this trunk would be virtually idle except during E 911 calls, the inefficiency of this architecture raises the question of whether a more efficient alternative can be developed.

BellSouth at 2.

Yet another potentially high cost is associated with the assignment of new telephone numbers to a PBX. As GTE explains:

Many PBXs today do not have Direct Inward Dial ("DID") Numbers assigned to every station. PBX extension numbers, often designating a hotel or hospital room number, are used to identify the station instead.

GTE at 3. The rates for DID service are significant: that is why a large percentage of PBX users do not have it.

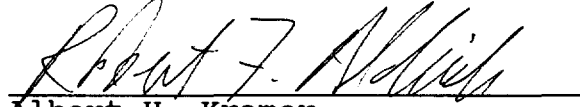
These comments underscore the need for the Commission to proceed carefully before casually imposing new requirements on CPE users.¹ Incurring any one of these costs -- modification of CPE, subscription to dedicated E911 trunks, and subscription to DID service -- would represent a substantial burden on a CPE customer. Incurring all three would be clearly intolerable.

NATA recognizes that the problem raised in Adcomm's petition is an important one, and NATA wants to help develop reasonable measures to address it. However, the Commission should look for less costly solutions. The Commission should supervise industry efforts to ensure that they result in the least costly practicable

¹Just last year, the Commission adopted a rule, over NATA's opposition, requiring business CPE users to modify or replace any telephone set on their premises which is not "hearing aid compatible." 47 CFR §§ 68.4, 112. Users have not been happy to hear that they must spend up to \$40 or more per telephone to "fix" problems which arise, not from any design defect in the CPE, but only from a change which is deemed desirable as public policy and which is required by a regulation promulgated long after the telephone was purchased and installed. The costs involved with E911 interconnection appear to be far greater.

form of E911 interconnection to multiline CPE users, and to ensure that the costs of such interconnection are fairly distributed.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Robert F. Aldrich", is written over a horizontal line.

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CERTIFICATION OF SERVICE

I HEREBY CERTIFY that on this 12th day of February, 1993, a true and correct copy of the foregoing Reply Comments was mailed first-class, postage prepaid, to:

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